

Rebekah S. Guyon (SBN 291037)
Rebekah.Guyon@gtlaw.com
Lori Chang (SBN 228142)
ChangL@gtlaw.com
David H. Marenberg (SBN 329954)
MarenbergD@gtlaw.com
GREENBERG TRAURIG, LLP
1840 Century Park East, 19th Floor
Los Angeles, CA 90067-2121
Tel: 310-586-7700; Fax: 310-586-7800

Attorneys for Defendants Vision Service Plan,
VSP Ventures, LLC, VSP Ventures
Management Services, LLC, and VSP
Ventures Optometric Solutions, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

BRIAN TASH on behalf of himself and all
others similarly situated,

Plaintiff,

v.

VISION SERVICE PLAN a/k/a VSP
GLOBAL, VSP VENTURES, LLC, VSP
VENTURES MANAGEMENT SERVICES,
LLC, and VSP VENTURES OPTOMETRIC
SOLUTIONS, LLC,

Defendants.

CASE 2:25-CV-00762-DJC-JDP

**STIPULATION AND ORDER TO EXTEND
DEFENDANTS' TIME TO RESPOND TO THE
COMPLAINT BY 58 DAYS**

Date of Service: March 24, 2025
Current Response Date: April 14, 2025
New Response Date: June 11, 2025

Assigned to: Judge Daniel J. Calabretta

Pursuant to Fed. R. Civ. P. 6(b)(1), Local Rule 144(a), and section IV of the Court's Standing Order (ECF No. 3-1), Plaintiff Brian Tash and Defendants Vision Service Plan, VSP Ventures, LLC, VSP Ventures Management Services, LLC, and VSP Ventures Optometric Solutions, LLC ("VSP") (collectively, the "Parties"), by and through their respective counsel, respectfully request that the Court approve the Parties' stipulation to extend the time for VSP to respond to the Complaint ("Complaint") by 58 days to June 11, 2025. In support of this stipulation, the Parties state as follows:

Plaintiff filed the Complaint on March 6, 2025 (ECF No. 1).

Plaintiff served VSP with a copy of the Complaint on March 24, 2025.

VSP's current deadline to respond to the Complaint is April 14, 2025.

Counsel for VSP seeks additional time to investigate the factual and legal issues raised by Plaintiff in the Complaint prior to filing a responsive pleading.

Lead counsel for VSP, Rebekah S. Guyon, will be taking maternity leave during at least April and May 2025.

Counsel for the Parties conferred on April 3, 2025, and determined that it would serve the interests of efficiency to extend VSP's response date by 58 days in light of lead counsel's upcoming maternity leave, and to allow the Parties additional time to investigate their respective claims and defenses and explore resolutions that may minimize or obviate the need for motion practice.

Local Rule 144(a) permits the Parties to initially stipulate to extend the time to respond to the Complaint by no more than twenty-eight (28) days without approval of the Court. The Parties also agree that good cause exists to extend the deadline an additional thirty (30) days, based on the facts set forth in this stipulation. This extension is not sought to unduly delay the proceedings and will not prejudice any Party.

No extensions have previously been sought by the Parties, and no further dates have been set by the Court in this case.

//

//

1 For these reasons, the parties jointly stipulate and request that the Court extend the
2 deadline for VSP to respond to the Complaint by 58 days to June 11, 2025.

3 Dated: April 4, 2025

MILBERG COLEMAN BRYSON PHILLIPS

4 GROSSMAN, PLLC

5
6 By: /s/ John J. Nelson (as authorized on April 3, 2025)

7 John J. Nelson
8 402 W. Broadway, Suite 1760
9 San Diego, CA 92101
10 Telephone: 858-209-6941
11 Email: jnelson@milberg.com

12 Heather Lopez
13 148 Dolphin Ct.
14 American Canyon, CA 94589
15 Telephone: 707-334-3727
16 Email: hlopez@milberg.com

17 Attorneys for Plaintiff Brian Tash

18
19 Dated: April 4, 2025

GREENBERG TRAURIG, LLP

20
21 By: /s/ Rebekah S. Guyon

22 Rebekah S. Guyon
23 Lori Chang
24 David H. Marenberg
25 1840 Century Park East, 19th Floor
26 Los Angeles, CA 90067
27 Tel: 310-586-7700; Fax: 310-586-7800
28 Email: Rebekah.Guyon@gtlaw.com
ChangL@gtlaw.com
MarenbergD@gtlaw.com

Attorneys for Attorneys for Defendants Vision Service
Plan, VSP Ventures, LLC, VSP Ventures Management
Services, LLC, and VSP Ventures Optometric
Solutions, LLC

ORDER

The Court, having considered the stipulation between Plaintiff Brian Tash and Defendants Vision Service Plan, VSP Ventures, LLC, VSP Ventures Management Services, LLC, and VSP Ventures Optometric Solutions, LLC ("VSP"), and for good cause shown, HEREBY ORDERS that:

VSP shall respond to the Complaint on or before June 11, 2025.

IT IS SO ORDERED.

Dated: April 4, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE